

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| IN RE:<br>Thomas E. Sloan<br>Judyth A. Sloan<br><br>Debtor(s)<br><br>WELLS FARGO BANK, N.A.<br><br>Movant<br><br>v.<br><br>Thomas E. Sloan<br>Judyth A. Sloan<br><br>William C. Miller, Esquire<br><br>Respondents | Chapter 13 Proceeding<br><br>19-11196-elf |
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**STIPULATION IN SETTLEMENT OF OBJECTION TO CONFIRMATION**

Secured creditor WELLS FARGO BANK, N.A.(“Wells Fargo”) and Thomas E. Sloan and Judyth A. Sloan (the “Debtors”) hereby stipulate the following in settlement of the pending Objection to Confirmation:

1. The parties agree to de- escrow the mortgage lien held by Wells Fargo for the property located at 5321 Morris Street Philadelphia, PA 19144. Debtor shall be responsible for the payment of all remaining unpaid escrow advances.
2. Debtors shall repay those certain post-petition escrow advances made by Wells Fargo through 2/19/2020 in the amount of \$2,273.50. The repayment of these post-petition advances shall be completed by the Debtors in connection with her Chapter 13 Plan such that the \$2,273.50 will be added to Claim #12, in the amount of \$7,950.14. The full payment to Wells Fargo for the pre-petition total debt claim, together with the post-petition escrow advances is **\$10,223.64**. Wells Fargo shall be repaid the \$10,223.64 over the 37 month term of the plan at 10.300% interest as follows:

|             |           |
|-------------|-----------|
| Loan Amount | 10,223.64 |
| Term        | 37        |
| Rate        | 10.300%   |
| Total P&I   | 11,976.30 |
| Prin & Int  | \$323.68  |

3. The Trustee shall disburse no less than the sum of \$11,976.30 to Wells Fargo in accordance with Claim #12 and this Stipulation. Debtors’ plan shall also reflect these provisions. No additional proofs of claim are required.

4. The parties agree that a facsimile may be submitted to the Court as if it were an original.

STIPULATED AND AGREED TO BY:

/s/ Erik B. Jensen, Esquire

Date: 4/16/2020

**Erik Jensen**, Esquire  
Attorney for Debtor(s)

/s/ Jill Manuel-Coughlin, Esquire

Date: 4/20/2020

Jill Manuel-Coughlin, Esquire  
Attorney for Movant

/s/ LeRoy Wm. Etheridge, Esquire for

Date: 4/20/2020

William C. Miller, Esquire  
Trustee

NO OBJECTION  
\*without prejudice to any  
trustee rights and remedies.

On this \_\_\_\_ day of \_\_\_\_\_, 2020, approved by the Court.

\_\_\_\_\_  
United States Bankruptcy Judge